

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Cheryl Sagataw, DeAnthony Barnes, Roberta  
Strong, Travis Neloms, Alvin Butcher,  
Adrian Tiger, Chance Askenette, Deven  
Caston, Lola Hegstrom, and RonDel  
Applebee, *on behalf of themselves and all  
others similarly situated,*

Case No. 24-cv-0001 (ECT/TNL)

**NOTICE OF DEPOSITION OF DEFENDANT**

Plaintiffs,

vs.

Mayor Jacob Frey, *in his individual  
and official capacity,*

Defendant.

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Please take notice that Plaintiffs Cheryl Sagataw, DeAnthony Barnes, Roberta Strong, Travis Neloms, Alvin Butcher, Adrian Tiger, Chance Askenette, Deven Caston, Lola Hegstrom, and RonDel Applebee, on behalf of themselves and the putative class of those similarly situated, (“Plaintiffs”) will take the deposition of Defendant Jacob Frey via remote videoconferencing technology, as agreed by the parties. The deposition will be taken before a certified court reporter authorized to administer oaths, and the parties agree that the court reporter may swear in the deponent remotely. Plaintiffs’ counsel’s office will circulate access instructions and/or dial-in instructions in advance of the deposition. Plaintiffs are available any day in the next month aside from December 12, 2024 that is convenient for Mayor Frey.

If remote videoconferencing technology becomes unavailable for more than thirty consecutive minutes during the deposition, then, at the option of Plaintiff’s counsel, Plaintiff may either proceed telephonically (or by remote videoconference with Plaintiff’s counsel’s video turned off) or may adjourn the deposition and reconvene the deposition to continue in-person or by remote videoconference on a mutually convenient date.

Plaintiff intends to record the testimony by videoconference technology, in addition to recording the testimony by stenographic methods.

Dated: December 2, 2024

s/Kira Kelley  
Kira Kelley (#402932)  
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